

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 21-144-1</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____, 2022</b>
<b>JOHN ADAMS</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1591(a)(1), (b)(2), (c)</b>
	<b>:</b>	<b>(sex trafficking of a minor - 2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1519 (tampering with</b>
	<b>:</b>	<b>evidence in a federal investigation -</b>
	<b>:</b>	<b>1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1512(b)(3) (tampering</b>
	<b>:</b>	<b>with a witness- 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1001 (false statements-</b>
	<b>:</b>	<b>2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

Between on or about January 10, 2020, and on or about January 30, 2020, in Philadelphia County, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JOHN ADAMS,**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained J.A., a minor whose identity is known to the grand jury, and attempted to do so, and aided and abetted the same, knowing and in reckless disregard of the fact that J.A. was under the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe J.A.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), (c), and

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between on or about January 10, 2020, and on or about January 30, 2020, in Philadelphia County, in the Eastern District of Pennsylvania and elsewhere, defendant

**JOHN ADAMS,**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained S.H., a minor whose identity is known to the grand jury, and attempted to do so, and aided and abetted the same, knowing and in reckless disregard of the fact that S.H. was under the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe S.H.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), (c), and

2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between on or about January 10, 2020, and on or about February 6, 2020, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JOHN ADAMS**

knowingly altered, destroyed, concealed, and covered up any record, document, and tangible object that can be used to record and preserve information, that is, the contents of a Samsung Galaxy S10 cellular telephone, bearing telephone number 267-588-7779, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 3, 2020, in the Eastern District of Pennsylvania and elsewhere, defendant

**JOHN ADAMS**

knowingly attempted to intimidate and corruptly persuade and engage in misleading conduct toward S.H., a minor whose identity is known to the grand jury, with the intent to hinder and prevent the communication to agents, police officers, and federal task force officers of the Federal Bureau of Investigation, Philadelphia Police Department, and Tinicum Township Police Department, each a law enforcement officer, of information relating to the commission of a Federal offense, that is, the sex trafficking of minors, by surreptitiously recording a conversation with S.H. and paying S.H. a sum of cash.

In violation of Title 18, United States Code, Section 1512(b)(3).

**COUNTS FIVE AND SIX****THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 6, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JOHN ADAMS**

willfully and knowingly made materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the government of the United States, in that defendant ADAMS told agents of the Federal Bureau of Investigation the following (each statement constituting a separate count):

<b>COUNT</b>	<b>DESCRIPTION</b>
5	Defendant JOHN ADAMS stated that he had not uploaded or posted advertisements to the website “Megapersonals.eu,” when, as he well knew, he had uploaded and posted advertisements to the website, using an account linked to his email address, <a href="mailto:voteadamsfortraffic@gmail.com">voteadamsfortraffic@gmail.com</a> .
6	Defendant JOHN ADAMS stated that he “never had a sexual conversation” with J.A., a minor whose identity is known to the grand jury, when, as he well knew, he did have conversations with J.A. via text message in which he discussed J.A. performing oral sex on other people and on defendant ADAMS himself.

All in violation of Title 18, United States Code, Section 1001.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 1591(a)(1), (b)(2), (c), as set forth in this indictment, defendant

**JOHN ADAMS**

shall forfeit to the United States of America:

(a) any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violations, and any property traceable to such property, including but not limited to a Samsung Galaxy S10 cellular telephone, bearing telephone number 267-588-7779; and

(b) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violations, and any property traceable to such property.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;



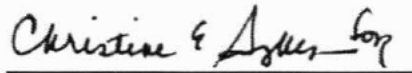
it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Sections 1594(d) and (e).

**A TRUE BILL:**



**GRAND JURY FOREPERSON**

  
**JACQUELINE C. ROMERO**  
United States Attorney

No. 21-144-1

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**JOHN ADAMS**

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**SUPERSEDING INDICTMENT**

**Counts**

18 U.S.C. § 1591(a)(1), (b)(2), (c)(sex trafficking of a minor - 2 counts); 18 U.S.C. § 1519 (tampering with evidence in a federal investigation - 1 count); 18 U.S.C. § 1512(b)(3) (tampering with a witness- 1 count); 18 U.S.C. § 1001 (false statements- 2 counts); 18 U.S.C. § 2 (aiding and abetting); Notice of forfeiture

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A true bill.

 Foreman

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Filed in open court this 15 day,  
Of September A.D. 20 22

Clerk

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Bail, \$ \_\_\_\_\_

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